

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA**

State of Oklahoma, ex rel. W.W.A. Drew
Edmondson, in his capacity as Attorney
General of the State of Oklahoma and
Oklahoma Secretary of the Environment C.
Miles Tolbert, in his capacity as the Trustee
for Natural Resources for the State of
Oklahoma,

Plaintiffs,

v.

Tyson Foods, Inc., Tyson Poultry, Inc., Tyson
Chicken, Inc., Cobb-Vantress, Inc., Aviagen,
Inc., Cal-Maine Foods, Inc., Cal-Maine
Farms, Inc., Cargill, Inc., Cargill Turkey
Production, LLC, George's, Inc., George's
Farms, Inc., Peterson Farms, Inc., Simmons
Foods, Inc., and Willow Brook Foods, Inc.,

Defendants.

05-CV-0329 GKF-SAJ

FILED

NOV 25 2008

Phil Lombardi, Clerk
U.S. DISTRICT COURT

MOTION FOR ADMISSION OF COUNSEL PRO HAC VICE

COMES NOW the separate Defendants, Cargill, Inc. and Cargill Turkey Production, LLC, by their attorneys Rhodes, Hieronymus, Jones, Tucker & Gable, PLLC, and pursuant to LCvR 83.2(g) and 83.3 move this Court for admission of Melissa C. Collins to appear *pro hac vice* in this case as out-of-state counsel for Cargill, Inc. and Cargill Turkey Production, LLC, on the following grounds:

1. The undersigned Leslie J. Southerland is counsel of record for Defendants Cargill, Inc. and Cargill Turkey Production, LLC in these proceedings. Leslie J. Southerland will

continue to serve as counsel to Defendants Cargill, Inc. and Cargill Turkey Production, LLC in these proceedings.

2. Pursuant to LCvR 83.2 (g), attached to this Motion as Exhibit 1 is the completed request form of Melissa C. Collins.

3. Melissa C. Collins is a member in good standing of the bar of Colorado. *See* Exhibit 1.

4. The proposed admittee understands that, upon admission *pro hac vice*, she shall be subject to the disciplinary jurisdiction of this Court.

5. The proposed admittee understands that admission *pro hac vice* is for this case only and does not constitute formal admission to the bar of this Court.

6. Submitted simultaneously with the filing of this motion is tender of the required \$75.00 fee to the Clerk of this Court.

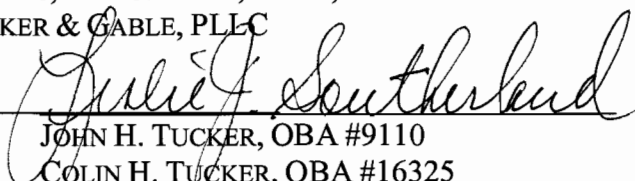
WHEREFORE Defendants, Cargill, Inc. and Cargill Turkey Production, LLC respectfully request that this Court grant this application for out-of-state attorney Melissa C. Collins to appear *pro hac vice* before this Court on behalf of Defendants Cargill, Inc. and Cargill Turkey Production, LLC, and enter the proposed Order submitted herewith.

Dated: November 25, 2008

Respectfully submitted,

RHODES, HIERONYMUS, JONES,
TUCKER & GABLE, PLLC

BY:


JOHN H. TUCKER, OBA #9110
COLIN H. TUCKER, OBA #16325
THERESA NOBLE HILL, OBA #19119
LESLIE J. SOUTHERLAND, OBA #12491
100 W. Fifth Street, Suite 400 (74103-4287)
P.O. Box 21100

Tulsa, Oklahoma 74121-1100
(918) 582-1173
(918) 592-3390 Facsimile

And

DELMAR R. EHRICH
BRUCE JONES
FAEGRE & BENSON LLP
2200 Wells Fargo Center
90 South Seventh Street
Minneapolis, Minnesota 55402
(612) 766-7000
(612) 766-1600 Facsimile
**ATTORNEYS FOR CARGILL, INC. AND
CARGILL TURKEY PRODUCTION LLC**

CERTIFICATE OF SERVICE

I certify that on the 25th day of November, 2008, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

W. A. Drew Edmondson, Attorney General
Kelly Hunter Burch, Assistant Attorney General
J. Trevor Hammons, Assistant Attorney General
Daniel Lennington, Assistant Attorney General

drew_edmondson@oag.state.ok.us
kelly_burch@oag.state.ok.us
trevor_hammons@oag.state.ok.us
Daniel.lennington@oag.ok.gov

Melvin David Riggs
Joseph P. Lennart
Richard T. Garren
Sharon K. Weaver
Robert Allen Nance
Dorothy Sharon Gentry
David P. Page
Riggs Abney Neal Turpen Orbison & Lewis, P.C.

driggs@riggsabney.com
jlennart@riggsabney.com
rgarren@riggsabney.com
sweaver@riggsabney.com
rnance@riggsabney.com
sgentry@riggsabney.com
dpage@riggsabney.com

Louis W. Bullock
J. Randall Miller
Miller Keffer & Bullock Pedigo LLC

lbullock@mkblaw.net
rmiller@mkblaw.net

William H. Narwold
Elizabeth C. Ward
Frederick C. Baker
Lee M. Heath
Elizabeth Claire Xidis
Fidelma L Fitzpatrick
Motley Rice LLC

bnarwold@motleyrice.com
lward@motleyrice.com
fbaker@motleyrice.com
lheath@motleyrice.com
cxidis@motleyrice.com
ffitzpatrick@motleyrice.com

COUNSEL FOR PLAINTIFFS

Stephen L. Jantzen
Paula M. Buchwald
Patrick Michael Ryan
Ryan, Whaley & Coldiron, P.C.

sjantzen@ryanwhaley.com
pbuchwald@ryanwhaley.com
pryan@ryanwhaley.com

Mark D. Hopson
Jay Thomas Jorgensen
Timothy K. Webster
Gordon D. Todd
Sidley Austin LLP

mhopson@sidley.com
jjorgensen@sidley.com
twebster@sidley.com
gtodd@sidley.com

L Bryan Burns
Robert W. George
Michael R. Bond
Erin W. Thompson
Dustin R. Darst
Kutack Rock LLP

bryan.burs@tyson.com
robert.george@tyson.com
michael.bond@kutackrock.com
erin.thompson@kutackrock.com
dustin.dartst@kutackrock.com

**COUNSEL FOR TYSON FOODS, INC., TYSON POULTRY, INC., TYSON CHICKEN, INC.;
AND COBB-VANTRESS, INC.**

R. Thomas Lay
Kerr, Irvine, Rhodes & Ables

rtl@kiralaw.com

Jennifer S. Griffin
Lathrop & Gage, L.C.
COUNSEL FOR WILLOW BROOK FOODS, INC.

jgriffin@lathropgage.com

Robert P. Redemann
Lawrence W. Zeringue
David C. Senger
Perrine, McGivern, Redemann, Reid, Berry & Taylor, PLLC

rredemann@pmrlaw.net
lzingue@pmrlaw.net
dsenger@pmrlaw.net

Robert E. Sanders
E. Stephen Williams
Young Williams P.A.

rsanders@youngwilliams.com
steve.williams@youngwilliams.com

COUNSEL FOR CAL-MAINE FOODS, INC. AND CAL-MAINE FARMS, INC.

George W. Owens
Randall E. Rose
The Owens Law Firm, P.C.

gwo@owenslawfirmmpc.com
rer@owenslawfirmmpc.com

James M. Graves
Gary V. Weeks
Woody Bassett
K.C. Dupps Tucker
Bassett Law Firm

jgraves@bassettlawfirm.com
gweeks@bassettlawfirm.com
wbassett@bassettlawfirm.com
kctucker@bassettlawfirm.com

COUNSEL FOR GEORGE'S INC. AND GEORGE'S FARMS, INC.

John R. Elrod
Vicki Bronson
Bruce W. Freeman
P. Joshua Wisley
Conner & Winters, LLLP
COUNSEL FOR SIMMONS FOODS, INC.

jelrod@cwlaw.com
vbronson@cwlaw.com
bfreeman@cwlaw.com
jwisley@cwlaw.com

A. Scott McDaniel
Nicole M. Longwell
Philip D. Hixon
Craig Mirkes
McDaniel, Hixon, Longwell & Acord, PLLC

smcdaniel@mhla-law.com
nlongwell@mhla-law.com
phixon@mhla-law.com
cmirkes@mhla-law.com

Sherry P. Bartley
Mitchell Williams Selig Gates & Woodyard
COUNSEL FOR PETERSON FARMS, INC.

sbartley@mws gw.com

Michael D. Graves
Dale Kenyon Williams, Jr.
COUNSEL FOR CERTAIN POULTRY GROWERS

mgraves@hallestill.com
kwilliams@hallestill.com

I also hereby certify that I served the attached documents by United States Postal Service, proper postage paid, on the following who are not registered participants of the ECF System:

Thomas C. Green
Sidley Austin Brown & Wood LLP
1501 K Street NW
Washington, DC 20005
**COUNSEL FOR TYSON FOODS,
INC., TYSON POULTRY, INC.,
TYSON CHICKEN, INC.; AND
COBB-VANTRESS, INC.**


Leslie J. Southerland

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OKLAHOMA

State of Oklahoma, et al.
Plaintiff(s)

vs.

Case Number: 05-CV-0329 GKF-SAJ

Tyson Foods, Inc., et al.
Defendant(s)

REQUEST FOR ADMISSION PRO HAC VICE
(to be attached to Motion for Admission Pro Hac Vice)

I hereby request admission to the Bar of this Court PRO HAC VICE in support of which I represent that the answers to the following questions are complete, true, and correct:

1. Full Name: Melissa C. Collins
2. State bar membership number: Colorado Bar No: 34285
3. Business address, telephone and fax numbers: Faegre & Benson LLP
3200 Wells Fargo Center, 1700 Lincoln Street, Denver, CO 80203
Tel: 303-607-3500, Fax: 303-607-3600
4. List all state and federal courts or bar associations in which you are a member "in good standing" to practice law:
All state courts in Colorado, U.S. District Court for the District of Colorado, Colorado Bar Association,
American Bar Association
5. Have you been denied admission, disbarred, suspended from practice, reprimanded, ☐ Yes ☒ No
denied "in good standing" status, or otherwise disciplined by any court, bar association,
grievance committee or administrative body?
6. Have any proceedings which could lead to any such disciplinary action been instituted ☐ Yes ☒ No
against you in any such bodies?

(Please attach a statement explaining any "Yes" answers to questions 5 or 6.)
7. Are you familiar with the Federal Rules of Evidence, the Federal Rules of Civil or ☒ Yes ☐ No
Criminal Procedure (as applicable to this case) and the local rules of this court?

Melissa C. Collins

Signature

Melissa C. Collins
Printed Name

CO - 34285
Bar Number

Faegre & Benson LLP
Firm Name

3200 Wells Fargo Center, 1700 Lincoln Street
Address

Denver,
City

CO 80203
State ZIP

(303) 607-3500
Phone

(303) 607-3600
Fax

mcollins@faegre.com
Email Address